

March 4, 2005

Mr. Deepak Joshi
Lead Aerospace Engineer (Structures)
National Transportation Safety Board
490 L'Enfant Plaza, SW
Washington, DC 20594

Dear Mr. Joshi,

I am writing to you with great anxiety over the latest proposed changes to 14 CFR 830.2 with regard to removing reference to ground damage to helicopter rotor blades from the list of exclusions. Your concern for safety is just but your methodology is inconsistent. As stated in the language of the NPRM, the NTSB "believes this revision is necessary because the main rotor blades of a helicopter are the lifting surfaces of the aircraft and are to be considered to be the equivalent to the wings of an airplane. Any damage to main or tail rotor blades—regardless of how it occurs—will likely adversely affect the performance of the aircraft and, if so, should be considered substantial damage." If this logic prevails then any airplane that experiences hangar rash or tug damage to its wings or propellers should also be considered substantial damage and reported to the NTSB. I base this statement on the current language present in 14 CFR 830.2 which states –

"Engine failure or damage limited to an engine if only one engine fails or is damaged, bent fairings or cowling, dented skin, small punctured holes in the skin or fabric, ground damage to rotor or propeller blades, and damage to landing gear, wheels, tires, flaps, engine accessories, brakes, or wingtips are not considered "substantial damage" for the purpose of this part."

The proposed changes to 14 CFR 830.2 is not necessary based on the following:

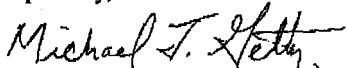
- Trained technicians are available to evaluate any damage that may occur.
- Manufacturers have extensive maintenance publications that provide owners, pilots and technicians with damage limits and repair procedures.
- Detailed engineering support is available from the manufacturers to assist and guide pilots and technicians on any situation that may occur.
- Notification of "incidents" is already required by 830.5(a).

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I feel that the proposed changes in 830.2 to eliminate ground rotor strikes from the exemption portion of the definition of "substantial damage" are not appropriate and are strongly opposed. The current established procedures provides a solid base of expertise that manages the risk that the NTSB is concerned about, yet allows a reasonable amount of time for an operator to control ever escalating operating costs.

Thank you for listening. Your time and effort is greatly appreciated.

Respectfully,



Michael J. Getty - Aircraft Technician

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